

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES PRACTICES AND SECURITIES LITIGATION This Document Relates to: Civil Action No. 18-296 (MJD/KMM)	MDL No. 17-2795 (MJD/KMM)
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JOINT STIPULATION REGARDING SERVICE AND SCHEDULE

Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund (“Oregon” or “Lead Plaintiff”), named plaintiff Fernando Alberto Vildosola, as trustee for the AUFV Trust U/A/D 02/19/2009 (“Vildosola,” and collectively with Oregon, “Plaintiffs”), and Defendants CenturyLink, Inc., Glen F. Post, III, R. Stewart Ewing Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey (collectively, “Defendants,” and, together with Plaintiffs, the “Parties”) in the above-captioned consolidated action (the “Action”), through their undersigned counsel of record, hereby stipulate and agree as follows:

1. WHEREAS, on June 13, 2018, the Court ordered the following schedule in the Action (ECF No. 110):

<u>Action/Event</u>	<u>Proposed Date</u>
Lead Plaintiff Files Consolidated Complaint	June 25, 2018
Defendants Answer Or Move To Dismiss The Consolidated Complaint	August 24, 2018
Plaintiffs Oppose Defendants’ Motion To Dismiss The Consolidated Complaint (If Any)	October 3, 2018

<u>Action/Event</u>	<u>Proposed Date</u>
Defendants' Reply In Support Of Motion To Dismiss (If Any)	November 1, 2018

2. WHEREAS, on June 25, 2018, Plaintiffs filed a Consolidated Complaint in the Action, which was the first pleading in the Action that named Puckett, Douglas, and Bailey as Defendants (ECF No. 143).

3. WHEREAS, Puckett, Douglas, and Bailey will be represented by the same counsel as the other Defendants in the Action;

4. WHEREAS, Defendants have not yet answered or responded to the Consolidated Complaint and intend to file answer(s) or response(s) to the Consolidated Complaint.

5. WHEREAS, Defendants represent that they seek additional time to respond to Plaintiffs' Consolidated Complaint in order to accommodate Defendants' and Defendants' counsel's schedules.

6. WHEREAS, pursuant to Local Rule 7.1(f)(1)(D), Defendants will, with Plaintiffs' consent, request to enlarge the word limit for their motion to dismiss and Plaintiffs' opposition, whereby Defendants will have 15,000 words to be divided between a single opening brief and reply brief and Plaintiffs will have 15,000 words for their opposition brief.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, through their undersigned counsel, as follows:

1. Defendants Puckett, Douglas, and Bailey, pursuant to Fed. R. Civ. P. 4(d), have waived service of summonses in connection with the Consolidated Complaint filed by Lead Plaintiff on June 25, 2018 (the "Waiver"), and the Action is proceeding, and shall proceed, as

if Defendants had been served with such summonses and complaints, in accordance with Fed. R. Civ. P. 4(d).

2. The instant Stipulation shall be filed with the Court and deemed to constitute proof of Defendants' Waiver.

3. All Defendants will answer or respond to the Consolidated Complaint on the following schedule:

<u>Action/Event</u>	<u>Proposed Date</u>
Defendants Answer Or Move To Dismiss The Consolidated Complaint	August 31, 2018
Plaintiffs Oppose Defendants' Motion To Dismiss The Consolidated Complaint (If Any)	October 12, 2018
Defendants' Reply In Support Of Motion To Dismiss (If Any)	November 9, 2018

Dated: August 22, 2018

Respectfully submitted,

/s/ Patrick E. Gibbs

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